

Mark W. Gifford
Kelley A. Anderson
P.O. Box 2508
Casper, Wyoming 82602
(307) 265-3265
Fax: (307) 265-3266
mark@giffordbrinkerhoff.com
kelley@giffordbrinkerhoff.com
Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

R&S WELL SERVICE, INC., a Wyoming)	
corporation, and MARKEL INSURANCE)	
COMPANY, a Virginia corporation,)	
)	
Plaintiffs/Counter-defendant,)	
)	
vs.)	Case No. 09-CV-72-B
)	
BRIAN THIESSEN, individually,)	
)	
Defendant/Counter-plaintiff.)	

PLAINTIFFS' DESIGNATION OF EXPERT WITNESS

COME NOW Plaintiffs, R&S Well Service, Inc. ("R&S") and Markel Insurance Company ("Markel"), by and through their counsel, Mark W. Gifford and Kelley A. Anderson, and hereby submit their Designation of Expert Witness.

Mark Bishop
Beckman Production Services, Inc.
3786 BeeBe Rd.

**P.O. Box 670
Kalkaska, Michigan 49646
231-518-7921**

Mr. Bishop is a controller for Beckman Production Services, as well as its wholly-owned subsidiary R&S Well Service, and has served in this capacity for the past six (6) years. As such, he will testify regarding the damages sustained by R&S as a result of the collision in question. Specifically, Mr. Bishop will testify as to R&S' claim for operating profit losses due to down time of the damaged rig (Rig #357) during repair.

Mr. Bishop will testify as to the weekly revenues received from Rig #357 during 2007 up until the time of the collision, as well as the percentage of profit recognized from those revenues, in accordance with the spreadsheets attached hereto and previously produced. He will further testify as to the utilization of other R&S rigs during the time that Rig #357 was out of service while being repaired in accordance with the Utilization Summary attached hereto and also previously produced. From this information, Mr. Bishop will testify as to the estimated net profit lost (\$29,208.29) as a result of Rig #357 being out of service during repair of the damages sustained in the collision.

Mr. Bishop will testify based on his background, training and experience as controller for R&S Well Service.

Mr. Bishop has not been retained or specially employed to provide expert testimony in this case, nor do his duties as controller for R&S regularly involve giving

expert testimony. Accordingly, this disclosure is not accompanied by a written report pursuant to F.R.C.P. 26(a)(2)(B).

The data considered by Mr. Bishop in arriving at his estimate of net profit losses to R&S is contained in the spreadsheets attached hereto.

Mr. Bishop has not authored any publications in the previous 10 years, has not testified as an expert at trial or by deposition during the previous four years, and does not expect compensation for his testimony in this case.

DATED this 14th day of August, 2009.

R&S WELL SERVICE, INC., and
MARKEL INSURANCE COMPANY,
Plaintiffs,

By _____ /s/

MARK W. GIFFORD
KELLEY A. ANDERSON
Gifford & Brinkerhoff
243 South Park Street
P.O. Box 2508
Casper, Wyoming 82602
(307) 265-3265
(307) 265-3266 (fax)
mark@giffordbrinkerhoff.com
kelley@giffordbrinkerhoff.com

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing *Plaintiffs' Designation of Expert Witness* has been *e-filed* and thereby electronically served, as well

as sent via U.S. Mail, first class postage prepaid, this 14th day of August, 2009, to the following:

Heather A. Zadina
haz@murane.com
Murane & Bostwick
508 West 27th Street
Cheyenne, WY 82001-3031

Julie Tiedeken
jtiedeken@mtslegal.net
Brian Hunter
bhunter@mtslegal.net
McKellar, Tiedeken & Scoggin, LLC
P.O. Box 748
Cheyenne, WY 82003

/s/
Kelley A. Anderson